

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Jane Doe 1, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

JPMorgan Chase Bank, N.A.,

Defendant.

Case No. 1:22-CV-10019 (JSR)

**DECLARATION OF RUST CONSULTING**

1. I am a resident of the United States of America, and am over the age of 18. I am a Program Manager for Rust Consulting, Inc. (“Rust Consulting”), the professional settlement services provider that has been retained to fulfill the Class Action Fairness Act (CAFA) notification for the settlement in the above-referenced action.

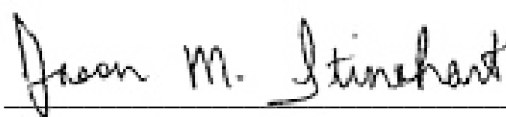
**CAFA NOTICE**

2. On June 30, 2023, Rust Consulting sent the CAFA Notice of Proposed Class Action Settlement for this matter to the offices of the attorney general of all 50 States and 9 territories, as well as the Attorney General of the United States, the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Reserve Bank of New York. Fifty-five of these notices were sent by United States Postal Service Priority Mail; eight were sent by email notification per the recipient’s preference. All available court documents are posted to a website at [www.cafanotices.com](http://www.cafanotices.com) where they can be viewed free of charge and without creating an account. An exemplary copy of the notice is attached hereto as Exhibit A. A list of the recipients of the notice is attached hereto as Exhibit B.

3. On July 3, 2023, Rust Consulting sent a supplemental CAFA Notice of Proposed Class Action Settlement for this matter to the same recipients (listed in Exhibit B), by the same means. An exemplary copy of the supplemental notice is attached hereto as Exhibit C.

I declare under penalty of perjury under the laws of the United States that the above is true and correct.

Executed on this 6th day of July, 2023, at Minneapolis, MN.

A handwritten signature in black ink, reading "Jason M. Stinehart", is written over a horizontal line.

Jason M. Stinehart

# EXHIBIT A

RUST CONSULTING INC  
920 2ND AVE S SUITE 400  
MINNEAPOLIS MN 55402



**Via U.S.P.S. Priority Mail**



MERRICK GARLAND  
UNITED STATES ATTORNEY GENERAL  
950 PENNSYLVANIA AVE NW  
WASHINGTON DC 20530-0001

June 30, 2023

*Re: Jane Doe I v. JPMorgan Chase Bank, N.A.  
United States District Court for the Southern District of New York  
Case No. 1:22-CV-10019 (JSR)*

Dear CAFA Notice Recipient:

Rust Consulting, Inc., on behalf of JPMorgan Chase Bank, N.A. (“JPMorgan”), defendant in the above-referenced action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between JPMorgan and the plaintiff in the above-referenced action. Please take notice of the following items of information, which are provided to you pursuant to 28 U.S.C. § 1715(b).

Plaintiff filed a motion with the United States District Court for the Southern District of New York on June 22, 2023, requesting preliminary approval of the proposed settlement. The Court has granted preliminary approval of the proposed settlement by order dated June 26 and entered June 27. The Court entered an amended preliminary approval order on June 29. The Court has scheduled a final approval hearing for November 9, 2023.

In reference to this letter, a website has been set up for viewing the documents associated with this case. The website is [www.cafanotices.com](http://www.cafanotices.com) and on this website, under the folder with the case name, the following documents can be found:

1. The complaints, all materials filed with the complaints, and any amended complaints filed in this matter;
2. The proposed settlement agreement between the Parties;
3. The proposed notice and claim form that will be provided to the Class;
4. A copy of Plaintiff’s motion for preliminary approval of the settlement, including all supporting documents; and
5. The Court’s June 27 preliminary approval order and an amended order issued on June 29.

It is not feasible at this time to provide a list of the names of the members of the class organized by the state in which they reside; nor is it feasible to provide an estimated proportionate share of the claims of such members to the entire settlement.

At this time, there has been no final judgment or notice of dismissal, and there are no written judicial opinions relating to the matters detailed in this notice.



The parties signed a confidential Term Sheet, which is referenced in the settlement agreement and was not filed with the Court. *See* 28 U.S.C. § 1715(b)(5). One of the purposes of the confidential Term Sheet is to provide JPMorgan with the option to terminate the proposed settlement if timely requests for exclusion from the settlement class are submitted by eligible settlement class members subject to the conditions set forth in the Term Sheet. It is typical for agreements of this nature to remain confidential because “[k]nowledge of the specific number of opt outs that will vitiate a settlement might encourage third parties to solicit class members to opt out.” Fed. Judicial Ctr., Manual for Complex Litigation (4th ed.) § 21.631.

If you have questions about this notice, the settlement, or how to access and view the documents on the website, please contact this office.

Sincerely,

Jason M. Stinehart  
Rust Consulting, Inc.  
920 2nd Ave S, Suite 400  
Minneapolis, MN 55402  
Email: [jstinehart@rustconsulting.com](mailto:jstinehart@rustconsulting.com)  
Phone: (612) 359-2906  
Facsimile: (612) 359-2050

## EXHIBIT B

Name1	Name2	Address1	City	State	Zip10	Email Address
AARON FORD	NEVADA ATTORNEY GENERAL					NVAGCAFAnotices@ag.nv.gov
AARON FREY	MAINE ATTORNEY GENERAL					haley.taranko@maine.gov
ALAN WILSON	SOUTH CAROLINA ATTORNEY GENERAL	PO BOX 11549	COLUMBIA	SC	29211-1549	
ANDREA CAMPBELL	OFFICE OF THE ATTORNEY GENERAL - GENERAL COUNSELS OFFICE	1 ASHBURTON PL, 20TH FLOOR	BOSTON	MA	02108-1518	
ANDREW BAILEY	MISSOURI ATTORNEY GENERAL	PO BOX 899	JEFFERSON CITY	MO	65102-0899	
ANNE E. LOPEZ	HAWAII ATTORNEY GENERAL	425 QUEEN ST	HONOLULU	HI	96813	
ANTHONY G. BROWN	MARYLAND ATTORNEY GENERAL					ddevoe@oag.state.md.us
ASHLEY MOODY	FLORIDA ATTORNEY GENERAL	THE CAPITAL PL 01	TALLAHASSEE	FL	32399-1050	
AUSTIN KNUDSEN	MONTANA ATTORNEY GENERAL	PO BOX 201401	HELENA	MT	59620-1401	
BOB FERGUSON	WASHINGTON ATTORNEY GENERAL	PO BOX 40100	OLYMPIA	WA	98504-0100	
BRENNIA BIRD	IOWA ATTORNEY GENERAL					consumer@ag.iowa.gov
BRIAN SCHWALB	DISTRICT OF COLUMBIA ATTORNEY GENERAL	400 6TH ST., NW	WASHINGTON	DC	20001	
BRIDGET HILL	WYOMING ATTORNEY GENERAL	109 STATE CAPITOL	CHEYENNE	WY	82002	
CAFA COORDINATOR	OFFICE OF THE ATTORNEY GENERAL - CONSUMER PROTECTION SECTION	455 GOLDEN GATE AVE STE 1100C	SAN FRANCISCO	CA	94102	
CHARITY R. CLARK	VERMONT ATTORNEY GENERAL	109 STATE ST STE 1	MONTPELIER	VT	05609-1001	
CHRIS CARR	GEORGIA ATTORNEY GENERAL	40 CAPITOL SQ SW	ATLANTA	GA	30334-1300	
DANA NESSEL	MICHIGAN ATTORNEY GENERAL	PO BOX 30212	LANSING	MI	48909	
DANIEL CAMERON	KENTUCKY ATTORNEY GENERAL	700 CAPITOL AVE RM 118	FRANKFORT	KY	40601	
DAVE YOST	OHIO ATTORNEY GENERAL	30 E BROAD ST 14 FL	COLUMBUS	OH	43215	
DENISE N. GEORGE	VIRGIN ISLANDS ATTORNEY GENERAL	3438 KRONPRINDSENS GADE 2ND FLOOR	ST THOMAS	VI	00802-5749	
DOMINGO EMANUELLI HERNANDEZ	PUERTO RICO ATTORNEY GENERAL	PO BOX 9020192	SAN JUAN	PR	00902-0192	
DOUGLAS MOYLAN	GUAM ATTORNEY GENERAL	590 S MARINE CORPS DR STE 901	TAMUNING	GU	96913	
DREW H. WRIGLEY	NORTH DAKOTA ATTORNEY GENERAL	600 E BOULEVARD AVE DEPT 125	BISMARCK	ND	58505-0040	
EDWARD ELADIO MANIBUSAN	NORTHERN MARIANA ISLANDS ATTORNEY GENERAL	CALLER BOX 10007	SAIPAN	MP	96950-8907	
ELLEN F ROSENBLUM	OREGON ATTORNEY GENERAL	1162 COURT ST NE	SALEM	OR	97301-4096	
ERNESTINE K. REGIIL	ATTORNEY GENERAL OF PALAU	PO BOX 6051 KOROR	PALAU	PW	96940	
FAINU'ULELEI FALEFATU ALA'ILIMA-UTU	AMERICAN SAMOA ATTORNEY GENERAL	EXECUTIVE OFFICE BUILDING - 3 FLOOR, PO BOX 7	UTULEI	AS	96799	
GENTNER DRUMMOND	OKLAHOMA ATTORNEY GENERAL	313 NE 21ST ST	OKLAHOMA CITY	OK	73105	
JASON S. MIYARES	VIRGINIA ATTORNEY GENERAL	202 NORTH NINTH STREET	RICHMOND	VA	23219	
JEFF LANDRY	LOUISIANA ATTORNEY GENERAL	PO BOX 94005	BATON ROUGE	LA	70804-4095	
JEROME H. POWELL, CHAIR	BOARD OF GOVERNORS OF THE FEDERAL RESERVE	20TH STREET AND CONSTITUTION AVENUE N.W.	WASHINGTON	DC	20551	
JOHN C. WILLIAMS, PRESIDENT	FEDERAL RESERVE BANK OF NEW YORK	33 LIBERTY STREET	NEW YORK	NY	10045	
JOHN FORMELLA	NEW HAMPSHIRE ATTORNEY GENERAL					DOJ-CPB@doj.nh.gov
JONATHAN SKRMETTI	TENNESSEE ATTORNEY GENERAL	PO BOX 20207	NASHVILLE	TN	37202-0207	
JOSH KAUL	WISCONSIN ATTORNEY GENERAL	PO BOX 7857	MADISON	WI	53707-7857	
JOSH STEIN	NORTH CAROLINA ATTORNEY GENERAL	9001 MAIL SERVICE CTR	RALEIGH	NC	27699-9001	
KATHY JENNINGS	DELAWARE ATTORNEY GENERAL	820 N FRENCH ST	WILMINGTON	DE	19801	
KEITH ELLISON	MINNESOTA ATTORNEY GENERAL	445 MINNESOTA ST STE 1400	SAINT PAUL	MN	55101-2131	
KEN PAXTON	TEXAS ATTORNEY GENERAL	PO BOX 12548	AUSTIN	TX	78711-2548	
KRIS KOBACH	KANSAS ATTORNEY GENERAL	120 SW 10TH AVE FL 2	TOPEKA	KS	66612-1597	
KRIS MAYES	ARIZONA ATTORNEY GENERAL	2005 N CENTRAL AVE	PHOENIX	AZ	85004-2926	
KWAME RAOUL	ILLINOIS ATTORNEY GENERAL					jennifer.lutz@ilag.gov
LETITIA JAMES	OFFICE OF THE NEW YORK ATTORNEY GENERAL					Cafa.notices@AG.NY.gov
LYNN FITCH	MISSISSIPPI ATTORNEY GENERAL	PO BOX 220	JACKSON	MS	39205	
MARTY JACKLEY	SOUTH DAKOTA ATTORNEY GENERAL	1302 E HIGHWAY 14 STE 1	PIERRE	SD	57501-8501	
MATTHEW J. PLATKIN	NEW JERSEY ATTORNEY GENERAL	PO BOX 080	TRENTON	NJ	08625-0080	
MERRICK GARLAND	UNITED STATES ATTORNEY GENERAL	950 PENNSYLVANIA AVE NW	WASHINGTON	DC	20530-0001	
MICHAEL J. HSU ACTING COMPTROLLER	OFFICE OF THE COMPTROLLER OF THE CURRENCY	400 7TH ST SW	WASHINGTON	DC	20219	
MICHELLE HENRY	PENNSYLVANIA ATTORNEY GENERAL	1600 STRAWBERRY SQ	HARRISBURG	PA	17120	
MIKE HILGERS	NEBRASKA ATTORNEY GENERAL	PO BOX 98920	LINCOLN	NE	68509	
PATRICK MORRISEY	WEST VIRGINIA ATTORNEY GENERAL	1900 KANAWHA BLVD E RM E26	CHARLESTON	WV	25305	
PETER NERONHA	RHODE ISLAND ATTORNEY GENERAL	150 S MAIN ST	PROVIDENCE	RI	02903-2907	
PHIL WEISER	COLORADO ATTORNEY GENERAL	1300 BROADWAY FL 10	DENVER	CO	80203	
RAUL LABRADOR	IDAHO ATTORNEY GENERAL	PO BOX 83720	BOISE	ID	83720-0010	
RAUL TORREZ	NEW MEXICO ATTORNEY GENERAL	PO BOX 1508	SANTA FE	NM	87504-1508	
RICHARD HICKSON	ATTORNEY GENERAL MARSHALL ISLANDS	PO BOX 890	MAJURO	MH	96960	
SEAN D REYES	UTAH ATTORNEY GENERAL	PO BOX 142320	SALT LAKE CITY	UT	84114-2320	
STEVE MARSHALL	ALABAMA ATTORNEY GENERAL	PO BOX 300152	MONTGOMERY	AL	36130-0152	
THE HONORABLE Joses R GALLEN	DEPARTMENT OF JUSTICE	PS 105, PALUKIR	POHNPEI	FM	96941	
TIM GRIFFIN	ARKANSAS ATTORNEY GENERAL	323 CENTER ST STE 200	LITTLE ROCK	AR	72201-2610	
TODD ROKITA	INDIANA ATTORNEY GENERAL	302 W WASHINGTON ST RM 5	INDIANAPOLIS	IN	46204	
TREG R. TAYLOR	ALASKA ATTORNEY GENERAL					consumerprotection@alaska.gov
WILLIAM TONG	CONNECTICUT ATTORNEY GENERAL	165 CAPITAL AVENUE	HARTFORD	CT	06106-1752	

## EXHIBIT C



**Via U.S.P.S. Priority Mail**



MERRICK GARLAND  
UNITED STATES ATTORNEY GENERAL  
950 PENNSYLVANIA AVE NW  
WASHINGTON DC 20530-0001

July 3, 2023

*Re: Jane Doe I v. JPMorgan Chase Bank, N.A.  
United States District Court for the Southern District of New York  
Case No. 1:22-CV-10019 (JSR)*

Dear CAFA Notice Recipient:

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4. A copy of Plaintiff’s motion for preliminary approval of the settlement, including all supporting documents; and
5. The Court’s June 27 preliminary approval order and an amended order issued on June 29.



It is not feasible at this time to provide a list of the names of the members of the class organized by the state in which they reside; nor is it feasible to provide an estimated proportionate share of the claims of such members to the entire settlement. Based on the limited information currently available to class counsel, the following is a reasonable estimate of the number of classmembers by state as well as their proportionate share of claims to the settlement:

State	Estimated Number of Classmembers	Estimated Proportionate Share
Arkansas	3	1
Arizona	6	2
California	19	7
Colorado	3	1
Florida	113	41
Georgia	3	1
Hawaii	3	1
Indiana	3	1
Massachusetts	3	1
Minnesota	3	1
North Carolina	3	1
New Jersey	6	2
Nevada	3	1
New York	52	19
Ohio	3	1
Pennsylvania	3	1
South Carolina	3	1
Tennessee	6	2
Washington	3	1
West Virginia	3	1

At this time, there has been no final judgment or notice of dismissal, and there are no written judicial opinions relating to the matters detailed in this notice.

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Sincerely,

Jason M. Stinehart  
Rust Consulting, Inc.  
920 2nd Ave S, Suite 400  
Minneapolis, MN 55402  
Email: [jstinehart@rustconsulting.com](mailto:jstinehart@rustconsulting.com)  
Phone: (612) 359-2906  
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